



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF  
 LU-16J

Via E-mail and Certified Mail 7014 2870 0001 9579 3838  
 RETURN RECEIPT REQUESTED

December 11, 2018

Mr. Joseph M. Bianchi  
 Group EHS Manager  
 Amphenol Corporation  
 40-60 Delaware Avenue  
 Sidney, NY 13838

Subject: Additional Off-site Groundwater Investigation, Request for Work Plan  
 Franklin Power Products, Inc./Amphenol Corporation  
 Administrative Order on Consent, Docket # R8H-5-99-00  
 EPA ID# IND 044 587 848

Dear Mr. Bianchi:

EPA has reviewed the off-site groundwater data collected under the *Off-site Groundwater Investigation Work Plan Franklin Power Products, Inc./Amphenol Corporation*, dated October 18, 2018 (October Work Plan). This is a request for Amphenol to collect additional information on the off-site groundwater plume. Please provide an extended study work plan designed to collect the information described below. The extended study work plan must incorporate the comments and conditions from EPA's October 23, 2018 conditional approval letter of the October Work Plan. The work plan is due by December 20, 2018.

- 1) There is some evidence that the C-Unit confining layer could be controlling local groundwater flow direction. Based on CMS borings PGP-6 and PGP-7, there appears to be a significant decrease in elevation of the top of the confining layer west of Forsythe St. Additional information is needed to determine whether this is the case. In addition, the topography of the C-Unit is undefined to the east.

Please prepare a map showing the elevation of the top of C-Unit using all available data from monitoring wells, temporary well borings, and other soil borings, including data collected during the RFI and CMS (some sample locations are labelled PGP, SGP, etc.). This map will help determine where the confining layer may be influencing control on local groundwater flow directions.

- 2) The western extent of groundwater contamination has not been delineated to VISLs or MCLs.

Amphenol must collect additional groundwater samples in the area west of North Forsythe St. wells TW-10, TW- 11, TW-12, TW-13, MW-31, and MW-32. Additional groundwater samples should also be collected in the area South of Ross Ct, East of Forsythe St, and North of Hurricane Creek.

Please provide an interim sample location figure to EPA for discussion in advance of the final work plan proposal. Upon receipt and review, EPA will work with you to identify the final sample locations for this event.

If data from this round of sampling report potential confounding sources in the western and southern area, EPA will discuss forensic approaches with Amphenol.

If you have any questions, please contact me at (312) 886-3020. Also, please feel free to contact Conor Neal, EPA hydrogeologist, at (312) 886-7193 with any questions.

Sincerely,



Carolyn Bury  
Project Manager  
Corrective Action Section 2  
Remediation and Re-use Branch

cc: Matt Kupcak, BorgWarner, Inc. Certified Mail 7009 1680 0000 7621 2378

ecc: Brad Gentry, IWM Consulting Group, LLC.  
Bhooma Sundar, RRB CAS2  
Conor Neal, RRB CAS2  
Motria Caudill, ATSDR  
Don Stilz, IDEM